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* Admitted in New York and New Jersey

February 15, 2018

VIA ECF

Hon. Stewart D. Aaron

United States Magistrate Judge

Southern District of New York

500 Pearl Street

New York, New York 10007

Re: Solid Oak Sketches, LLC v. Visual Concepts, LLC et al, SDNY Index No.:

1:16-cv-00724-LTS-RLE

Your Honor:

I represent plaintiff Solid Oak Sketches, LLC along with Heitner Legal, PLLC in the above-referenced matter. On or about February 3, 2018, I initiated correspondence with Defendant's counsel over e-mail about the prospect of our filing a motion, pursuant to Federal Rule of Civil Procedure 26(c), to request a stay of discovery at this time given the multitude, consistency, and expense of the discovery demands being placed upon our client versus the uncertainty of how much longer this case will even continue on, given the still pending motion by Defendant for judgment on the pleadings (Docket No. 76). While Defendant's counsel did not share our position, they ultimately agreed to consent to a stay of damages discovery until the liability phase of this matter has been completed.

Based on the foregoing, the Parties jointly and respectfully request that the Court formally recognize and "so-order" a stay of damages discovery in this matter until the case's liability phase has been completed. No prior requests for a stay of damages discovery have been made. The July 7, 2017

Pre-Trial Scheduling Order (Docket No. 72) provides for an April 5, 2018 deadline for the completion of all non-expert witness discovery in the absence of a stay.

Thank you in advance for your consideration of this letter.

Respectfully Submitted,

/s/

Paul S. Haberman (PH 2771)